

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Plaintiff,)
v.) CASE NO.
Defendant.)
) JUDGE
)
) REPORT OF PARTIES' PLANNING
) MEETING UNDER FED. R. CIV.
) P. 26(f) AND LR 16.3(b) and 23.1
) (For Use in Putative Class Actions)
)

1. Pursuant to Fed. R. Civ. P. 26(f) and LR 16.3(b) and 23.1, a meeting was held on _____

_____ , 20____, and was attended by:

_____, Counsel for plaintiff(s) _____

_____, Counsel for plaintiff(s) _____

_____, Counsel for defendant(s) _____

_____, Counsel for defendant(s) _____

2. The parties:

have exchanged the pre-discovery disclosures required by Rule 26(a)(1);

will exchange such disclosures by _____, 20__;

object that initial disclosures are not appropriate in this action

3. The parties recommend the following track:

Expedited Standard Complex

Mass Tort

4. This case is suitable for one or more of the following Alternative Dispute Resolution ("ADR") mechanisms:

Early Neutral Evaluation Mediation Arbitration

Summary Jury Trial Summary Bench Trial

Case not suitable for ADR

5. Recommended cut-off date for amending the pleadings (including proposed class definition) and/or adding additional parties: _____.

6. The parties _____ do/_____ do not consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. § 636(c).

7. Electronically Stored Information. The Parties: (indicate one):

agree that there will be no discovery of electronically-stored information; or

have agreed to a method for conducting discovery of electronically-stored information;

or

have agreed to follow the default standard for discovery of electronically-stored information (Appendix K to Northern District of Ohio Local Rules).

8. Recommended Case Management Plan:

Discovery relevant to appropriateness of certification of the proposed class be completed by: _____, including:
plaintiff(s)' depositions by: _____
defendant(s)' 30(b) depositions by: _____
plaintiff(s)' expert reports by: _____
defendant(s)' expert reports by: _____
expert depositions by: _____

Plaintiff's motion for class certification to be filed by _____.

Defendant's opposition to motion for class certification to be filed by:
_____.

9. Recommended dispositive motion date, if any: _____

10. Recommended date for a Status Hearing: _____

11. Other matters for the attention of the Court:

Attorney for Plaintiff

Attorney for Plaintiff

Attorney for Defendant

Attorney for Defendant